

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

9 ST. ALBANS ROAD,
CORINNA, MAINE, with all
appurtenances and improvements thereon,

Defendant *In-Rem*.

No. 1:24-cv-00165-JAW

MOTION FOR DECREE OF FORFEITURE

PURSUANT to Federal Rules of Civil Procedure 55(b) and Rules C and G of the Supplemental Rules for Certain Admiralty and Maritime Claims, plaintiff, the United States of America, respectfully moves this court for a Decree of Forfeiture in the above-entitled action.

This motion is supported by the following materials, as incorporated by reference: (1) the Verified Complaint for Forfeiture filed on May 9, 2024 (Dkt. #1); (2) an Affidavit Regarding Notice to 336 Apex, Inc., Wen Hui Li, and Jing Zheng filed on September 9, 2024, and the attachments filed therewith (Dkt. ##12, 12-1, 12-2, and 12-3; (3) the service of process made on the Defendant *in-rem* property filed on July 3, 2024 (Dkt. #5); (4) the advertising declaration and attachment filed on September 6, 2024 (Dkt. ##10 and 10-1); (5) the Affidavit in Support of Entry of Default (Dkt. #11-1); and (6) the entry of default against the Defendant *in-rem* property and all persons claiming an interest in the Defendant *in-rem* property entered on September 9, 2024 (Dkt. #13).

WHEREFORE, the United States of America respectfully moves this court for a Decree of Forfeiture as to the Defendant *in-rem* property.

Dated: October 3, 2024
Bangor, Maine

Respectfully submitted,

DARCIE N. MCELWEE
United States Attorney

/s/ ANDREW K. LIZOTTE
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CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2024, I caused the foregoing Motion to be electronically filed with Clerk of Court using the CM/ECF system, which sent such notice to any individuals and entities who have entered appearances in this case to date, pursuant to the Court's ECF system.

I hereby further certify that I have caused copies of the foregoing Motion to be sent to all potential claimants via U.S. Mail.

DARCIE N. MCELWEE
United States Attorney

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